IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

IN RE:	)	BANKRUPTCY CASE
	)	
REGINA T PRESSWOOD,	)	NO.: 17-21676-JRS
	)	
Debtor.	)	CHAPTER 13
	)	
	)	
	)	
	)	
	)	

OBJECTION TO CONFIRMATION

COMES NOW Wells Fargo Bank, N.A. (hereinafter known as "Creditor"), a secured creditor holding a Security Deed against the real property commonly known as 2071 Trimleston Rd, Statham, GA 30666 (the "Property"), and for the reasons stated below, objects to confirmation of Debtor's Chapter 13 plan (Doc. No. 19) (the "Plan").

1.

Debtor's Plan underestimates the estimated prepetition arrearage amount of $7,633.55 owed to Creditor for the Property.

2.

Creditor reserves the right to raise the failure of Debtor to have made post-petition mortgage payments if at the time of the confirmation hearing that appears to be the case.

WHEREFORE, Creditor prays that the Court will:

1. Deny confirmation,
2. Award reasonable attorney's fees, and
3. Grant such other and further relief as is just and equitable.

/s/John D. Schlotter

John D. Schlotter
GA BAR NO. 629456
Attorney for Creditor
McCalla Raymer Leibert Pierce, LLC
1544 Old Alabama Road
Roswell, GA 30076
678-281-6453
John.Schlotter@mccalla.com

In Re: Regina T Presswood

Bankruptcy Case No.: 17-21676-JRS

Chapter: 13

Judge James R. Sacca

CERTIFICATE OF SERVICE

I, John D. Schlotter, of MCCALLA RAYMER LEIBERT PIERCE, LLC, 1544 Old Alabama Road, Roswell, Georgia 30076-2102, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I served a copy of the within OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Regina T Presswood
2071 Trimleston Road
Statham, GA 30666

David Visser Houtsma *(served via email at david@davidhlaw.com)*
David Houtsma Law Firm LLC
2435 Creek Tree Lane
Cumming, GA 30041

Nancy J. Whaley, Trustee *(served via email)*
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303

U.S. Trustee *(served via ECF Notification)*
United States Trustee
362 Richard Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 9/27/2017 (date) By: */s/John D. Schlotter*
John D. Schlotter
Georgia BAR NO. 629456
Attorney for Creditor